UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

VANTAGE FINANCIAL SERVICES, INC. Plaintiff,

٧.

NONPROFIT SERVICE GROUP AND GEORGE E. MILLER,

Defendants.

C.A. No. 04-11686-WGY

JOINT CASE MANAGEMENT PROPOSAL

Pursuant to Rules 16(b) and 26(f), F.R.Civ.P. and Rule 16.3 of the Local Rules of this Court, the parties have conferred and submit the following Joint Case Management Proposal:

	<u>Item</u>	Completion Date
1.	Completion of fact discovery	4/30/05
2.	Each party's initial expert report served	5/31/05
3.	Each party's rebuttal expert report served	6/30/05 ¹
4.	All motion papers for Summary Judgment served	7/30/05
5.	All opposition papers to Summary Judgment	8/15/05
6.	Replies to Summary Judgment oppositions	9/30/05
7.	Final Pretrial Conference – On or after 10/03/05 (per 10/28/04 Order)	
8.	Trial – On or after 11/7/05 (per 10/28/04 Order)	

The parties jointly request that trial be scheduled at earliest convenience of the Court following disposition of any Summary Judgment motions.

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¹ The parties have agreed and therefore propose that if either party determines that expert depositions are necessary, such depositions will be completed in advance of the final pretrial conference.

Respectfully submitted,

VANTAGE FINANCIAL SERVICES, INC. By its Attorneys,

Havrenu M. Johnson/ih.

Laurence M. Johnson BBO #252720 Davis, Malm & D'Agostine One Boston Place Boston, MA 02108 (617) 367-2500 ljohnson@davismalm.com

NONPROFIT SERVICE GROUP, INC. and GEORGE E.MILLER

By their attorneys,

Richard L. Nahigian, Esq.,

BBO#: \$49096

PEABODY & ARNOLD LLP 30 Rowes Wharf, 6th Floor

Boston, MA 02110-3342

(617) 951-2100

rnahigian@peabodyarnold.com